1 2 3 4 5 6 7	RENE L. VALLADARES Federal Public Defender Nevada State Bar No. 11479 SEAN A. MCCLELLAND Assistant Federal Public Defender Nevada State Bar No. 16581 200 S. Virginia Street, Suite 340 Reno, Nevada 89501 (775) 321-8451/Tel. (702) 388-6261/Fax Sean_McClelland@fd.org Attorney for SAUL NOLASCO	
8	UNITED STATES DISTRICT COURT DISTRICT OF NEVADA	
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11	UNITED STATES OF AMERICA,	Case No. 3:23-cr-00032-MMD-CLB
12	Plaintiff,	ORDER GRANTING
13	V.	STIPULATION TO CONTINUE SENTENCING HEARING
14	SAUL NOLASCO,	(FIRST REQUEST)
15	BOBBY JO KISSEL, MARIA VALENZUELA,	
16	and XOCHITL MICHEL SANCHEZ-PACHECO	
17	Defendants.	
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19	IT IS HEREBY STIPULATED AND AGREED, by and between Federal Publi	
20	Defender Rene L. Valladares, Assistant Federal Public Defender SEAN A. MCCLELLAND	
21	counsel for SAUL NOLASCO, JANICE HUBBARD, counsel for BOBBY JO KISSEI	
22	JENNIFER MAYHEW, counsel for MARIA VALENZUELA, LEAH WIGREN, counsel for	
23	XOCHITL MICHEL SANCHEZ-PACHECO, United States Attorney Jason M. Frierson, and	
24	Assistant United States Attorney ANDOLYN JOHNSON, counsel for the United States of	
25	America, that the Sentencing hearings in this case be vacated and continued as follows:	
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Saul Nolasco currently scheduled for 12/2/2024 be vacated and continued to **January** 22, 2025 at 9:00 AM;

Xochitl Michel Sanchez-Pacheco currently scheduled for 1/6/2025 be vacated and continued to January 22, 2025 at 9:30 AM;

Maria Valenzuela currently scheduled for 12/17/2024 be vacated and continued to January 22, 2025 at 10:00 AM;

Bobby Jo Kissel currently scheduled for 1/7/2025 be vacated and continued to **January** 22, 2025 at 10:30 AM.

The Stipulation to continue is entered into for the following reasons:

The continuance is necessary for the following reasons:

- 1. The additional time requested by this Stipulation is reasonable pursuant to Federal Rule of Criminal Procedure 32(b)(2), which states that the "court may, for good cause, change any time limits prescribed in this rule."
- 2. Counsel requests this additional time in order to allow adequate time to research sentencing issues and to prepare for the sentencing hearing.
- 3. Defendants Saul Nolasco, and Bobby Jo Kissel are currently on bond and consent to the continuance.
- 4. Defendants Maria Valenzuela, and Xochitl Michel Sanchez-Pacheco are currently detained and consent to the continuance.
- 5. The defendants were informed that this continuance will allow defense counsel to continue to gather documents in support of the hearing and provide continuity of counsel.

This is the first stipulation to continue filed herein. 1 2 DATED this 29th day October, 2024. 3 RENE L. VALLADARES JASON M. FRIERSON 4 Federal Public Defender United States Attorney 5 By: /s/Sean A. McClelland By: <u>/s/Andolyn Johnson</u> 6 SEAN A. MCCLELLAND ANDOLYN JOHNSON 7 Assistant United States Attorney Assistant Federal Public Defender Counsel for Saul Nolasco Counsel for United States 8 By: /s/Janice Hubbard 9 JANICE HUBBARD Counsel for Bobby Jo Kissel 10 By: /s/Jennifer Mayhew 11 JENNIFER MAYHEW 12 Counsel for MARIA VALENZUELA 13 By: /s/Leah Wigren **LEAH WIGREN** 14 Counsel for XOCHITL MICHEL SANCHEZ-PACHECO 15 16 17 18 19 20 21 22 23 24 25 26

## <u>ORDER</u>

Based on the Stipulation of counsel, and good cause appearing,

IT IS THEREFORE ORDERED that the Sentencing Hearings in this case will be vacated and continued as follows:

Saul Nolasco currently scheduled for 12/2/2024 is vacated and continued to **January** 22, 2025 at 9:00 AM;

Xochitl Michel Sanchez-Pacheco currently scheduled for 1/6/2025 is vacated and continued to January 22, 2025 at 9:30 AM;

Maria Valenzuela currently scheduled for 12/17/2024 is vacated and continued to January 22, 2025 at 10:00 AM;

Bobby Jo Kissel currently scheduled for 1/7/2025 is vacated and continued to **January** 22, 2025 at 10:30 AM.

DATED this 30th of October, 2024.

MIRANDA M. DU

UNITED STATES DISTRICT JUDGE